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## UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF MONTANA

In re:

SHOOT THE MOON, LLC, a Montana limited liability company,

Debtor.

In Proceedings Under Chapter 11

Case No. 2:15-bk-60979-RBK

## TRUSTEE'S OBJECTION TO NOTICE REQUESTING PAYMENT TO BAUER AND TC VENTURES

CHAPTER 11 TRUSTEE, JEREMIAH FOSTER, by and through his counsel of record, and hereby objects to the Notice Requesting Payment filed by Bauer and TC Ventures (Doc 79) which this Court set for hearing on December 4, 2015 by Order dated November 13, 2015 (Doc 81). Counsel for Trustee contacted Nancy Dzbanko, a representative of claimant, TC Ventures, and obtained copies of the 6 invoices upon which the claim is based, attached hereto as Exhibit 1. The invoices are for prepetition cleaning services performed at certain restaurants

owned by Debtor. Counsel again contacted Ms. Dzbanko, who confirmed the

invoices were for services performed prepetition. Counsel advised Ms. Dsbanko

and Mr. Charles Bauer that they would have to file a proof of claim for these

services and provided them with a proof of claim form. Accordingly, Trustee

objects to the application for payment of the claim as an administrative expense.

DATED this 18<sup>th</sup> day of November, 2015.

/s/ Trent N. Baker

Trent N. Baker

DATSOPOULOS, MACDONALD & LIND, P.C.

Attorneys for Trustee

## **CERTIFICATE OF SERVICE**

The undersigned does hereby certify that on the 18<sup>th</sup> day of November, 2015 a copy of the foregoing Trustee's Objection To Notice Requesting Payment By Bauer And Tc Ventures was served electronically by the Court's ECF notice to parties requesting special notice or otherwise entitled to the same and that in addition service by mailing a true and correct copy via First Class Mail, postage prepaid, at Missoula, Montana, to the following persons or entities who are not ECF registered users:

Michael T. Conway LeClairRyan 885 Third Avenue, Sixteenth Floor New York, NY 10022 On behalf of Dennis P. Connor

Thomas E. Copley, CPA, CVA Wipfli LLP First Interstate Plaza Missoula, MT 59802 On behalf of WIPFLI

Charles Bauer 5103 w Hazard Rd Spokane, Wa 99208

Alliance Funding Group Inc C/O Mark Scott 18400 Von Karman Ave Ste 800 Irving, Ca 92612

/s/ Trent l	N Baker	
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